



- (c) A maximum of twenty-five (25) interrogatories by each party to any other party. (Responses due 30 days after service).
- (d) A maximum of twenty-five (25) requests for admission by each party to any other party. (Responses due 30 days after service).
- (e) A maximum of ten (10) depositions by the plaintiff and ten (10) by each of the defendants (not to include expert witness depositions), excluding depositions upon written questions.
- (f) Each deposition limited to maximum of seven (7) hours unless extended by agreement of parties.
- (g) Reports from retained experts under Rule 26(a)(2) shall be due:
  - (i) from the plaintiff by October 17, 2006, with said experts to be made available for deposition by November 17, 2006;
  - (ii) from the defendants by December 8, 2006, with said experts to be made available for deposition by January 12, 2007.
- (h) Supplementations under Rule 26(e) shall be due on January 19, 2007.

**3. Other Items.**

- (a) The parties do not request a conference with the court before entry of the scheduling order.
- (b) The parties request a pre-trial conference March 23, 2007.
- (c) Plaintiff should be allowed until September 29, 2006 to join additional parties and amend the pleadings.
- (d) Defendants should be allowed until October 27, 2006 to join additional parties and amend the pleadings.
- (e) All potentially dispositive motions should be filed by March 16, 2007.
- (f) Settlement of the case is possible but cannot be evaluated prior to the completion of discovery. At such time, if any of the parties believe the use of alternative dispute resolution procedures may be beneficial in resolving this case, the parties, individually or jointly, will so advise the court.
- (g) Witness and Exhibit lists under Rule 26(a)(3) shall be due **30 days** prior to trial. The parties will have **15 days** after receipt of Witness and Exhibit Lists to list objections under Rule 26(a)(3).

- (h) The case should be ready for trial by May 7, 2007 and should take approximately three (3) days to try.

Dated this 16th day of August, 2006.

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*Attorney for Plaintiff Vinnie Norman*

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s/William J. Long

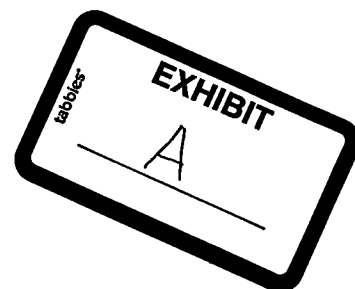
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*Attorney for Family Dollar Stores, Inc.*



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Burr & Forman, LLP  
Attn: William J. Long  
3100 Wachovia Tower 420 North 20<sup>th</sup> Street  
Birmingham, AL 35203

Re: Vinnie Norman v. Family Dollar Stores, Inc.

Dear Mr. Long:

I am sorry we have been unable to speak. However, I have no record of your calls. I am writing to inform you that I have amended my original complaint to include additional defendants, which may negate the need for this matter to be tried in Federal Court. Should you desire a hearing on the matter in state court, in regards to my amendment and your removal of the matter to federal court, I will not object and will petition the court jointly for a "fast-track" hearing on the matter, prior to our federal court Rule 26 deadline of August 18, 2006.

Should you wish to conference with me on the matter I may be reached at one of the numbers listed below, or via email at [cpitts@thepittsfirm.com](mailto:cpitts@thepittsfirm.com).

Sincerely,  
The Pitts Firm

  
Christopher B. Pitts

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